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Subject:	U.S. EPA – Hunters Point Naval Shipyard – Updates on the radiological retesting of soils and buildings
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Attachments:	2020.08.18_ParcelG_SoilApprovalLetter.pdf 2020_08_20_EPACommentLtr_HPNS_BuildingRGEvaluation.pdf

Office of Congresswoman Nancy Pelosi
Office of Senator Dianne Feinstein
Office of Senator Kamala Harris

Dear Colleagues:

We have committed to keep you updated on EPA's oversight of the Navy's radiological retesting at the Hunters Point Naval Shipyard site. We have recently sent two important letters to the Navy (attached) which we briefly describe below.

On August 18, 2020, EPA Region 9's Superfund section manager sent the Navy a letter to provide approval of plans to proceed with the soil radiological retesting fieldwork at Parcel G. This retesting address soils previously tested by Tetra Tech EC Inc., (TTEC), a former Navy contractor. After TTEC completed work, the Navy, EPA, and the state found evidence that TTEC workers had falsified data and engaged in questionable field and laboratory practices. The Navy will begin at Parcel G, then complete work plans to perform radiological testing on other parcels. At Parcel G, the Navy will analyze more than 7,000 soil samples to determine if additional cleanup is needed. This decision will be based on the established remediation goals (cleanup levels) for each radionuclide, as well as background.

"Background" refers to levels of chemicals or radionuclides that exist in the environment in the absence of Superfund site contamination. In June 2020, the Navy finalized its report on the soil background study with input from the regulatory agencies. In the report, the Navy established a "background threshold value" for Cesium-137 that is slightly higher than the remediation goal (cleanup level) for the site. Consistent with EPA guidance, this Cesium-137 value may be used as a new cleanup target, effectively applied as a new remediation goal. Additionally, the Navy found a relatively large range of background radionuclide concentrations in onsite soils. This is in part due to the complex landfill history of the site. (Most of the surface soils consist of rock and soil cut from nearby hills, sediments dredged from the San Francisco Bay, and other offsite fill material.)

Understanding background is important, because Superfund site cleanups generally do not clean up to levels that are below background. The Navy will work with EPA and the state to

develop a memorandum-to-the-file (memo) to legally document how the Navy will implement the information from the background study. A memo is an appropriate mechanism for this small change to the remedies in the site's Records of Decisions (or the cleanup plans). These small changes allow the Navy to focus on addressing site-related radionuclides in soil during the radiological retesting.

The Navy is preparing to start the soil radiological retesting fieldwork. We understand the Navy and its contractor have implemented measures to protect their employees and control the spread of COVID-19. Throughout fieldwork, we expect the Navy will periodically report on its efforts to control dust and monitor air quality to EPA, the state, and the community. In addition, EPA and the state expect to be onsite to monitor Navy compliance with its Parcel G work plan and to independently analyze select soil samples.

At the conclusion of the soil radiological retesting fieldwork, the Navy will produce a completion report to summarize the results. We also expect the Navy's completion report will evaluate additive cancer risk from multiple radiological and chemical contaminants, if present. This information will better inform the public, EPA, and Navy risk managers about the protectiveness of the cleanup.

In addition to the soil radiological retesting, the Navy's Parcel G work plan includes plans to perform radiological retesting of the current, onsite buildings. **On August 20, 2020, EPA Region 9's project manager sent the Navy a comment letter on its evaluation of the radiological remediation goals (or cleanup levels) for current, onsite buildings.** That evaluation relies on tools and methods to assess cancer risk from exposure to radiation. Last year, the Navy proposed to use RESRAD BUILD, a tool developed by the Department of Energy's Argonne National Laboratory, in lieu of the EPA's tool called the Building Preliminary Remediation Goal (BPRG) Calculator.

In consultation with our national experts, at this time, EPA cannot concur with the Navy's conclusion that the radiological building remediation goals (or cleanup levels) remain protective of human health. We were unable to verify a key parameter used in RESRAD BUILD or establish reasons why RESRAD BUILD is more appropriate than the BPRG Calculator for the site. However, we are prepared to work with the Navy to finalize the radiological building remedial goal evaluation and ensure the radiological survey methods used during the building retesting will adequately protect human health. Our comment letter outlines a proposed path forward to use a modified version of EPA's BPRG Calculator, and we look forward to continuing to work with the Navy on a solution.

Regards,

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